

1155 AVENUE OF THE AMERICAS, NEW YORK, NY 10036-2711

**JENNER & BLOCK** LLP

October 15, 2024

Laura MacDonald  
Tel +1 212 891 1696  
LMacDonald@jenner.com**VIA EMAIL**The Honorable Dale E. Ho  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007  
HoNYSDChambers@nysd.uscourts.gov**Re: *Watson v. NY Doe 1 et al.*, No. 19 Civ. 533 (DEH) (VF)**

Dear Judge Ho,

We are writing on behalf of the Parties in the above-captioned case pursuant to Rule 6.d.iv of your Individual Rules and Practices in Civil Cases to jointly request permission to file a submission by email.

The Parties recently completed summary judgment briefing, provisionally filed under seal. *See* Dkt. 270. The Parties' filings include three summary judgment motions and over 100 exhibits total. Any motions to seal the summary judgment filings, proposed highlighted redactions to the filings, and redacted versions of the filings are due this Friday, October 18, 2024. *See* Dkts. 270, 272.

In light of the number of filings at issue, and to facilitate the Court's review of the Parties' requested redactions, the Parties respectfully request permission to submit **highlighted** versions of the summary judgment papers jointly via Kiteworks (a secure file-transfer platform), or the Court's preferred file-transfer platform, instead of under seal on the docket. Should the Court grant this request, the Parties would only file **redacted** versions of the summary judgment papers on the docket.

The Parties appreciate the Court's attention to this matter.

Respectfully submitted,

/s/ Laura P. MacDonaldLaura P. MacDonald  
Jenner & Block LLP  
*Counsel for Defendant and Counterclaimant NY Doe 2*

October 15, 2024

Page 2

/s/ Hannah Brown Goehring  
Hannah Brown Goehring  
Gordon Rees Scully Mansukhani, LLP  
*Counsel for Defendant and Counterclaimant Illinois Doe 1*

/s/ Michael W. Ayotte  
Michael W. Ayotte  
Law Offices of Michael W. Ayotte  
*Counsel for Plaintiff and Counterclaim Defendant Ralph M. Watson*

Dated: New York, New York  
October 15, 2024

The Court is in receipt of this joint letter. The application is DENIED in part and GRANTED in part.

The request to submit filings via a private file-sharing platform is DENIED. The parties are directed to file unredacted, highlighted versions of their filings under seal on the docket via CM/ECF, with access limited to relevant parties. The Court GRANTS temporary sealing of those documents until the Court resolves the requests for permanent sealing.

SO ORDERED.



Dale E. Ho  
United States District Judge  
Dated: October 17, 2024  
New York, New York